

MPS Supplier Code of Ethical Conduct

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## **1 Introduction**

MPS is a mutual organisation owned by its members; as such we are custodians of members subscriptions and represent their collective voice. Our behaviours reflect on our members and we therefore strive to act in ways that our members will approve.

MPS is committed to carrying out its business in a fair, open and honest manner and wants to be an attractive business partner establishing reliable and fair relations with its suppliers for the mutual benefit of MPS and its suppliers. MPS expects its suppliers to act competently and to seek continuous improvement in areas such as quality, cost control, innovation and reliability.

## **2 Purpose of the Code**

The MPS Supplier Ethical Code of Conduct (“Code”) illustrates the values according to which MPS operates globally. MPS expects its suppliers to conform to the requirements of the Code in their dealings with MPS, their own employees and suppliers, as well as third parties including government officials and others.

## **3 Reciprocity with contracts**

Unless explicitly referenced, nothing in this Code is intended to be incorporated into, to vary or to supplement contractual terms that have been separately agreed by MPS and its suppliers. The Code sets out MPS’s high-level expectations for the minimum standards of supplier conduct and should be regarded as a framework in which suppliers must endeavour to operate, above and beyond specific contractual provisions.

## **4 Legal Compliance**

The Code is not a substitute for nor should it be considered to override applicable laws and regulations, but sets the minimum standards of behaviour that is expected to be followed. To the extent the supplier is unable to comply with the Code due to laws and regulations, the supplier shall, to the extent reasonably possible, adhere to the spirit of the Code.

If local customs or practices are in contradiction with the Code, the supplier shall inform MPS and again comply with spirit of the Code.

## **5 BUSINESS CONDUCT**

### **5.1 Ethical Conduct**

The supplier shall in all its operations be committed to ethical conduct and the respect for human rights in the spirit of internationally recognised standards.

### **5.2 Prohibition of Corruptive Practices**

MPS expects its suppliers to have zero tolerance towards fraud, bribery and corruption.

The supplier shall ensure that its directors, employees and third parties acting on its behalf do not offer, promise, give or accept any bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any other improper advantage. In particular, the supplier shall not engage in any form of bribery or kickback scheme or otherwise offer any incentive to MPS employees or their family or friends in order to obtain or retain any business.

Customary and reasonable business courtesies, including gifts and corporate hospitality (e.g. entertainment, business lunches and small gifts) are permitted, provided that they are given in compliance with applicable laws. MPS staff will only accept such gifts and hospitality where it is appropriate to do so, in accordance with MPS's own Code of Ethical Conduct.

The supplier should not provide any business courtesies to a MPS employee or his/her family members in any situation in which it might influence, or appear to influence, an employee's decision in relation to the supplier. Therefore, the supplier should use restraint in offering business courtesies to MPS employees and his/her family members. Any business courtesies must be reasonable both to their scope, value and frequency, and must reflect ordinary local business customs. Cash or equivalent, such as gift cards, can never be offered.

The supplier shall act fairly, openly and honestly in its dealings with MPS and in particular shall be alert to fraud, within its own supply chain.

### **5.3 Conflicts of Interest**

The supplier should avoid any interaction with MPS employees that may conflict, or appear to conflict, with that employee's duty to act in the best interests of MPS. The supplier shall disclose to MPS all conflicts of interests or situations giving the appearance of a conflict of interest in its engagement with MPS.

The supplier must inform MPS if a MPS employee or his/her immediate family member holds a material financial or other interest in the supplier. The supplier must also inform MPS if a MPS employee or his/her immediate family member holds a managerial position at the supplier, or works for the supplier and such employment creates a conflict of interest or the appearance thereof.

#### **5.4 Fair Competition**

The supplier shall compete in a fair manner in compliance with all applicable competition laws and regulations. For example, the supplier shall not enter into any agreements with its competitors to increase prices or to restrict the availability of products.

### **6 LABOUR AND HUMAN RIGHTS**

#### **6.1 Non-discrimination**

The supplier shall treat its employees in a fair and equal manner. The supplier shall not discriminate in the hiring or promoting of employees whether based on gender, age, religion, marital status, sexual orientation, political opinion, or national or ethnic origin, or other similar characteristic that does not relate to the individual's qualifications or the inherent requirements for the job.

#### **6.2 Modern slavery, child or forced labour**

Suppliers are expected to demonstrate a zero tolerance approach to modern slavery and human trafficking, and to comply with relevant laws including the UK Modern Slavery Act 2015. In addition the supplier shall not use child or forced labour under any circumstances, or contract with subcontractors or suppliers using such labour.

#### **6.3 Respect and Dignity**

The supplier shall treat its employees with dignity and respect, and shall ensure that its employees have a harassment-free working environment. The supplier shall not tolerate any type of harassment of its employees, whether direct or indirect, physical or verbal.

#### **6.4 Wages and Benefits**

The supplier shall ensure that compensation paid to its employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours and mandatory benefits.

## **6.5 Freedom of Association**

The supplier shall respect its employees' right to freely associate and bargain collectively in compliance with all applicable laws and regulations.

## **7 HEALTH AND SAFETY**

The supplier shall provide its employees a safe and healthy working environment in compliance with all applicable laws and regulations.

Appropriate health and safety information, training and equipment shall be provided to the supplier's employees. The supplier shall also have effective safety programs in place covering at least human safety, emergency preparedness and exposure to dangerous chemicals and biological substances. The supplier's employees shall not be under the influence of alcohol or illegal drugs while working for MPS.

## **8 ENVIRONMENT**

The supplier shall make all reasonable efforts to protect the environment, and to keep the impact of its activities and products on the environment as low as possible. In particular, the supplier shall obtain, maintain and comply with all environmental permits, licenses and registrations necessary for its operations.

The supplier shall monitor, control and appropriately treat wastewater, air emissions and other waste generated from its operations. The supplier shall strive to reduce waste to the extent possible.

The supplier shall have an adequate and systematic approach to take environmental aspects into account that includes, if applicable, establishing a suitable environmental management system. The supplier shall adhere to all applicable environmental laws and regulations regarding the prohibition or restriction of specific substances, including labelling for recycling and disposal.

The supplier is encouraged to determine the carbon footprint of its products.

## **9 MONITORING**

The supplier shall regularly monitor its conformance with the Code.

The supplier shall upon request provide MPS access to all relevant information and documents needed to verify the supplier's conformance with the Code. Should MPS have a reason to believe that the supplier may be in breach of the Code (e.g. based on media reports), MPS may itself or through a third party auditor review the supplier systems and processes to validate the supplier's evidence for conformance with the Code. In addition, MPS expects its suppliers to adopt an open attitude to monitoring by MPS and to engage with MPS to continuously

improve compliance, cooperating with any development actions identified. If the supplier has a serious concern that something is not consistent with this Code, the supplier shall report the matter to MPS by emailing: [ethics@Medicalprotection.org](mailto:ethics@Medicalprotection.org)

**10 APPLICABILITY**

By agreeing to work with MPS the supplier confirms that it and its affiliates will comply with the MPS Supplier Code of Ethical Conduct. An “affiliate” refers in this Code to a company that is controlled by the supplier, controls the supplier or is under common control with the supplier.

The supplier shall use best endeavours to ensure that its own suppliers, subcontractors, consultants and partners also comply with the principles of the Code.

**11 ACKNOWLEDGED & APPROVED**

Compliance with the Code is a mandatory requirement for supplying goods or services to MPS, and by receiving this Code the supplier commits to act legally and ethically in accordance with it.

*Please sign & return to MPS*

Company name:	Company reg number:
Signed on behalf of Name:	Position:
Signed on behalf of signature:	Date: